

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Salem Harbor Power Development LP (f/k/a
Footprint Power Salem Harbor
Development LP), *et al.*¹,

Debtors.

Chapter 11

Case No. 22-10239 (MFW)

(Jointly Administered)

Related Docket No. 175

**DECLARATION OF RICHARD W. RILEY IN SUPPORT OF THE MOTION OF
IBERDROLA ENERGY PROJECTS INC. FOR
AN ORDER PURSUANT TO SECTION 105(a) OF THE BANKRUPTCY
CODE, FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004, AND
LOCAL BANKRUPTCY RULE 2004-1 AUTHORIZING AND DIRECTING THE
EXAMINATION OF THE DEBTORS, PREPETITION OFFICERS, MANAGERS, AND
POTENTIAL TRANSFER RECIPIENTS**

1. I am Counsel at the law firm of Whiteford, Taylor & Preston LLC and counsel for Judgment Creditor Iberdrola Energy Projects Inc. (“IEP”) in the above-captioned proceedings.

2. I make this declaration to place before the Court certain documents relevant to the instant *Motion Of Iberdrola Energy Projects Inc. For An Order Pursuant To Section 105(A) Of The Bankruptcy Code, Federal Rule Of Bankruptcy Procedure 2004, And Local Bankruptcy Rule 2004-1 Authorizing And Directing The Examination Of The Debtors, Prepetition Officers, Managers, And Potential Transfer Recipients*.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Salem Harbor Power Development LP (f/k/a Footprint Power Salem Harbor Development LP) (1360); Highstar Salem Harbor Holdings GP, LLC (f/k/a Highstar Footprint Holdings GP, LLC) (2253); Highstar Salem Harbor Power Holdings L.P. (f/k/a Highstar Footprint Power Holdings L.P.) (9509); Salem Harbor Power FinCo GP, LLC (f/k/a Footprint Power Salem Harbor FinCo GP, LLC) (N/A); Salem Harbor Power FinCo, LP (f/k/a Footprint Power Salem Harbor FinCo, LP) (9219); and SH Power DevCo GP LLC (f/k/a Footprint Power SH DevCo GP LLC) (9008). The location of the Debtors’ service address is: c/o Tateswood Energy Company, LLC, 480 Wildwood Forest Drive, Suite 475, Spring, Texas 77380.

3. Attached hereto as **Exhibit A** is a true and correct copy of the Arbitration Award between IEP and Debtors, as filed with the Supreme Court of the State of New York, New York County and downloaded from that court's electronic docket.

4. Attached hereto as **Exhibit B** is a true and correct copy of the Judgment as entered on the Arbitration Award, as entered by the Supreme Court of the State of New York, New York County and downloaded from that court's electronic docket. The time to appeal this judgment has expired.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 16, 2022

/s/ Richard W. Riley

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